

KEVIN KERVENG TUNG, P.C.

Attorneys and Counselors at Law

Writer's direct email:

Ge Li, Esq., admitted in NY and NJ

gli@kktlawfirm.com

Queens Crossing Business Center

136-20 38th Avenue, Suite 3D

Flushing, New York 11354

Tel: (718) 939-4633

Fax: (718) 939-4468

www.kktlawfirm.com

June 24, 2021

The Honorable Margo K. Brodie, U.S.D.J.

United States District Court

Eastern District of New York

225 Cadman Plaza East

Brooklyn, New York 11201

Re: *Northern Food I/E, Inc. v. OCM Globe Inc., etc.*

Civil Action No.: 1:21-cv-01813-MKB-SJB

Your Honor:

This firm represents the plaintiff Northern Food I/E, Inc. ("Northern Food" or "Plaintiff") in the above-referenced case. According to the Court's instructions in the conference held on June 10, 2021, I have met and conferred with defendants' counsel and the parties have agreed to the following briefing schedule for Northern Food's Motion for Preliminary Injunction:

- Plaintiff shall refile its Motion for a Preliminary Injunction on or before June 28, 2021;
- Defendants shall file their opposition to Motion For Preliminary Injunction on or before July 26, 2021;
- Plaintiff shall file its Reply on or before August 16, 2021.

As to defendants' Motion to Dismiss the Complaint, and alternatively to change venue, the parties have met and conferred concerning the issues raised in defendants' request for a pre-motion conference and were unable to reach an agreement. Accordingly, the parties have agreed to the following briefing schedule:

- Defendants shall file their motion on or before July 16, 2021;
- Plaintiff's opposition is due on August 6, 2021;
- Defendant's reply in further support of motion is due on August 20, 2021

Plaintiff does not plan to withdraw its case against defendant Yaotian Li, despite Li's Motion to Dismiss the case against him for lack of personal jurisdiction. The reasons for

Plaintiff's such decision is explained in its separate letter in response to defendants' pre-motion letter (Dkt. No. 13).

Thanks for Your Honor's attention to this matter.

Sincerely,
/s/Ge Li
Ge Li